

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC EMERGENCY DOCKET            )  
RELATED TO THE NOVEL CORONAVIRUS    ) CASE NO. 2020-00085  
COVID-19                                        )**

**RESPONSE OF**

**South Hopkins Water District**

**TO**

**COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION**

**DATED JUNE 23, 2020**

**FILED: July 9, 2020**

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>ELECTRONIC EMERGENCY</b>	)	
<b>DOCKET RELATED TO THE NOVEL</b>	)	<b>CASE NO. 2020-00085</b>
<b>CORONAVIRUS COVID-19</b>	)	

**CERTIFICATION OF RESPONSE OF [WATER DISTRICT] TO  
COMMISSION STAFF’S INITIAL REQUEST FOR INFORMATION**

This is to certify that I have supervised the preparation of South Hopkins Water District Responses to Commission Staff’s Initial Request for Information. The response submitted on behalf of South Hopkins Water District is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date: \_\_\_\_\_

\_\_\_\_\_  
Kayla Goodaker, Office Manager  
South Hopkins Water District

## **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8 and the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085 regarding electronic filings, I certify that South Hopkins Water District Response to Commission Staff's Initial Request for Information was transmitted to the Public Service Commission by way of email on July 9, 2020 and South Hopkins Water District will file original paper copies of this filing within 30 days of the lifting of the State of Emergency.

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Kayla Goodaker, Office Manager  
South Hopkins Water District

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 1**

**Responding Witness: Kayla Goodaker**

**Q-1. Provide the utility's current number of customers and the date used for that determination.**

A-1. Total customers as of May 2020 - 2,957

**South Hopkins Water District  
CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 2**

**Responding Witness: Kayla Goodaker**

**Q-2. If applicable, provide the utility's current number of customers per class.**

A-2. Commercial- 110  
Industrial- 2  
Public- 19  
Residential- 2,826

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 3**

**Responding Witness: Kayla Goodaker**

**Q-3. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average total bill for all customers for:**

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020.**

**Total bill is defined as including charges for current service and past service that is unpaid, including the accumulation of fees.**

**A-3. These totals were figured up by adding the totals off the code summary report for each month of the year, divided by 12 (months), and divided again by the amount of customers billed at the end of the year.**

**\*See attachments provided in excel format**

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 4**

**Responding Witness: Kayla Goodaker**

**Q-4. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average total bill for all customers in each class for:**

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020.**

**Total bill is defined as including charges for current service and past service that is unpaid, including the accumulation of fees.**

**A-4. These totals were figured by adding the totals off the code summary report for each class for the year, divided by 12 (months), and divided again by the amount of customers billed at the end of the year.**

**\*See attached excel sheet**

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 5**

**Responding Witness: Kayla Goodaker**

**Q-5. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average bill for current service for all customers for:**

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020.**

A-5. The averages for the arrearages were figured up by adding the arrear amounts off the billing register each month and dividing it by 12 (months) for each year. For the 2020 amounts for each month, each month was taken off the billing register.

\*See attached excel sheet



**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 6**

**Responding Witness: Kayla Goodaker**

**Q-6. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Provide the average bill for current service for all customers in each class for:**

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020.**

**The differences between request 3 and request 5, and request 4 and request 6 should provide the average arrearage for all customers and for each class, respectively.**

A-6. The averages for the arrearages were figured up by taking each of the classes arrear amounts off the code summary report, adding them together, and then dividing them by 12 (months). This was done for each class.

\*See attached excel sheet

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 7**

**Responding Witness: Kayla Goodaker**

- Q-7. Explain how the utility calculates bad debt.**
- a. Explain the decision criteria governing when the utility writes off bad debt.**
  - b. Provide the monthly bad debt write-offs for each month in 2018, 2019 and 2020.**
  - c. If the utility has changed its calculation or determination of bad debt in the past two years, explain its previous calculation or determination of bad debt and the reason for the change.**
- A-7. Bad debt is calculated by printing off the aging report and anything that is from 60 days prior and inactive is listed by route.**
- a. If the bad debt is not paid, it is logged in the ledger**
  - b. See attached excel sheet**
  - c. N/A**

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 8**

**Responding Witness: Kayla Goodaker**

**Q-8. Assuming the Commission's moratorium on disconnections was not in effect, provide the number of customers in each class that would be subject to disconnection, and the date used for this determination.**

A-8. The date is as of June 24, 2020. The numbers include everything that should have been cut off since March 2020. The number of disconnects can not be broken up in classes. Also, as stated, these numbers are from June 24. The numbers could have been more at the end of each month because of customers paying late, or paying a month behind.

March 2020 – 42

April 2020 - 13

May 2020 – 26

June 2020 - 210

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 9**

**Responding Witness: Kayla Goodaker**

**Q-9. Provide the percent of customers, by class, that pay on time for:**

- a. 2017 as a year, not each month;**
- b. 2018 as a year, not each month;**
- c. 2019 as a year, not each month; and**
- d. Each month in 2020**

A-9. 2017- 84%  
2018- 86%  
2019- 84%  
2020- Jan-83%  
Feb-83%  
March-No data due to not sending out delinquent notices  
April-No data due to not sending out delinquent notices  
May- No data due to not sending out delinquent notices

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 10**

**Responding Witness: Kayla Goodaker**

**Q-10. Provide the following information for January 1, 2015, until December 31, 2019. If a utility provides multiple services, such as both water and sewer residential service, provide the information requested for each service separately. For those customers that receive combined service, provide each service separately if separately served or combined if billed on a combined basis. Further, provide the following information by class.**

- a. Provide monthly totals of service termination notices issued to customers only for nonpayment of bills.**
- b. Provide monthly totals of service terminations for customers only for non- payment of bills.**
- c. Provide the total number of customers for each month.**

**This information should be provided so as not to duplicate customer counts. The information requested in this request should be presented similarly to the residential-only information provided in Case No. 2019-00366. For reference, refer to Louisville Gas and Electric Company and Kentucky Utilities Company's response to Post-Formal Conference Request for Information filed with the Commission on March 6, 2020.**

**A-10. See attached excel sheet.**

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 11**

**Responding Witness: Kayla Goodaker**

**Q-11. Provide the total income received from late payment fees for:**

- a. Each month in 2017;**
- b. Each month in 2018;**
- c. Each month in 2019; and**
- d. Each month in 2020**

A-11. See attached excel sheet

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 12**

**Responding Witness: Kayla Goodaker**

**Q-12. Quantify the amount of late payment fees the utility would have assessed since March 16, 2020, absent the Commission's directive.**

A-12. From March until May, the District would have had around \$2,362.94 a month. Making a total of about \$7,088.82. This amount was figured out by taking the average of January and February penalties. This was used to estimate what each month's penalty would be.

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 13**

**Responding Witness: Kayla Goodaker**

**Q-13. Provide copies of all general communication provided to customers regarding arrearages, late payments, payment plans, etc. since March 16, 2020. Customer-specific communication is excluded from this request.**

A-13. Delinquent notices have not been sent since cutoffs can not be done. However, arrears show up on the bills if not paid by the time the new bills come out.



**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 14**

**Responding Witness: Kayla Goodaker**

**Q-14. Provide a detailed explanation and breakout of any cost increases and decreased income (by customer class if applicable) the utility has experienced as a result of the COVID-19 State of Emergency.**

A-14. The expenses stayed about the same for the District however, the income for the District has drastically changed. The water sales for March 2020 was \$10,281.52 LESS than for February 2020. The sales were down due to customers letting their bills become delinquent and not paying the bills.

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 15**

**Responding Witness: Kayla Goodaker**

**Q-15. Provide a detailed explanation and breakout of any cost decreases and increased income the utility has experienced as a result of the COVID-19 State of Emergency.**

A-15. There have been no cost decreases or any increased income for the District.

**South Hopkins Water District**

**CASE NO. 2020-00085**

**Response to Commission Staff's Initial Request for Information**

**Question No. 16**

**Responding Witness: Kayla Goodaker**

**Q-16. Provide any additional information or data the utility believes the Commission should consider in amending or vacating its previous Orders in this matter.**

A-16. The District is losing money on reconnect fees as well as penalties. The District is also losing money on payments because there are no consequences for customers to not pay the bills. As of June 24, 2020 there were 42 customers who still had not paid March bills, 13 who still had not paid April bills, 26 who had not paid May bills and 208 customers who had not paid June bills. This is a total of 289 payments the District has not received. Not collecting income from bills is putting a huge strain on the District financially. South Hopkins Water District purchases around \$60,000/month of water to provide to our customers. This expense, along with many others, makes it very difficult to pay when the district is not obtaining proper payments. It is the hope of the District this issue is sincerely considered.